

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF: )  
PRINCE C. AJAERE, ) CHAPTER 13  
DEBTOR(S) ) CASE NO. 18-20760  
                        ) JUDGE BARNES  
                        )

NOTICE OF MOTION

**The following parties have been served via electronic mail:**

See attached service list.

**The following party(s) have been served via regular US mail:**

See attached service list.

PLEASE TAKE NOTICE that on September 24, 2020, at 1:30 p.m., I will appear before the Honorable Judge Barnes, or any judge sitting in that judge's place and present the Motion to Substitute Attorney, a copy of which is attached.

**This motion will be presented and heard telephonically.** No personal Appearance in court is necessary or permitted. To Appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.Court-Solutions.com](http://www.Court-Solutions.com) or by calling Court Solutions at (917)746-7476.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objections is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ David M. Siegel  
David M. Siegel, A.R.D.C. #6207611

PROOF OF SERVICE

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, before 5:00 p.m. on September 10, 2020 with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

/s/ David M. Siegel  
David M. Siegel, A.R.D.C. #6207611

DAVID M. SIEGEL & ASSOCIATES, LLC  
Attorney For Debtor  
790 Chaddick Drive  
Wheeling, IL 60090  
847/520-8100

**The following parties have been served via electronic mail:**

US Trustee: USTPRegion11.ES.ECF@usdoj.gov  
Marilyn O. Marshall, Chapter 13 Trustee: [courtdocs@chi13.com](mailto:courtdocs@chi13.com)

**The following party(s) have been served via regular US mail:**

Mr. Prince Ajaere  
1411 Selikrik Street  
Flossmoor, IL 60422

Ted Smith  
Smith Ortiz, PC  
4309 W. Fullerton Ave.  
Chicago, IL 60639

Discover Bank  
P.O. Box 3025  
New Albany, OH 43054-3025

JP Morgan Chase  
National Bankruptcy Dept.  
P.O. Box 29505 AZ1-1191  
Phoenix, AZ 85038-9505

American Express National Bank  
c/o Becket & Lee  
P.O. Box 3001  
Malvern, PA 19355-0701

Toyota Motor Credit Corp.  
P.o. Box 9013  
Addison, TX 75001

Capital One Bank  
P.O. Box 71083  
Charlotte, NC 28272-1083

LVNV Funding/Citibank  
Resurgent Capital Services  
P.O. Box 10587  
Greenville, SC 29603-0587

Progressive Credit Union  
131 W. 33<sup>rd</sup> St., 7<sup>th</sup> Floor  
New York, NY 10001

Citibank  
701 East 60<sup>th</sup> Street North  
Sioux Falls, SD 57117

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 )

MOTION FOR SUBSTITUTION OF ATTORNEY

NOW COMES the Debtor, PRINCE C. AJAERE, by and through his attorney, DAVID M. SIEGEL AND ASSOCIATES, LLC, and in support of her Motion, states as follows:

1. That Prince C. Ajaere is the Debtor for the above captioned Chapter 13 bankruptcy case.
2. That said case was filed on August 21, 2018 with Marilyn O. Marshall appointed as Trustee.
3. That Debtor's attorney at the time of filing was Ted Smith of Smith Ortiz, PC.
4. That Debtor has terminated the services of Ted Smith of Smith Ortiz, PC on or about September 9, 2020. (See attached Exhibit A)
5. That the Debtor wishes to be represented by David M. Siegel for the remainder of his case.

WHEREFORE, Debtor respectfully requests that this honorable court grant Debtor's Motion to substitute attorney David M. Siegel for her prior counsel, Ted Smith of Smith Ortiz, PC.

Respectfully Submitted,

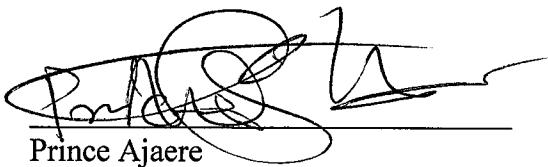
/s/ David M. Siegel  
David M. Siegel, A.R.D.C. #6207611  
Attorney for the Debtor(s)

David M. Siegel, ARDC #6207611  
Attorney For Debtors  
DAVID M. SIEGEL AND ASSOCIATES, LLC  
Attorney For Debtors  
790 Chaddick Drive  
Wheeling, IL 60090  
(847) 520-8100

# EXHIBIT A

9-9-20

I, Prince Ajaere, no longer wish to be represented by Ted Smith, nor the law firm of Smith Ortiz.  
I wish to hire David M. Siegel & Associates, LLC.



A handwritten signature in black ink, appearing to read "Prince Ajaere". The signature is fluid and cursive, with a large, stylized 'P' at the beginning. It is positioned above a solid horizontal line.

Prince Ajaere